

03/03/05

Hon. Greg Sorbara
Minister of Finance
Frost Bldg S, 7th Flr
7 Queen's Park Cres
Toronto, ON M7A 1Y7

Honourable Minister,

Re. Ontario Beverage Alcohol System Review

On behalf of member Medical Officers of Health, Boards of Health and Affiliate organizations of the Association of Local Public Health Agencies (alPHa), I am writing today on the subject of the Expert Panel to Review Sale and Distribution of Beverage Alcohol in Ontario.

Having read the terms of reference, membership of the panel and the government press release on the subject, our members have expressed some concerns about the parameters of this review. We do not wish to comment on the value of this exercise as an economic and business analysis, but we do hope that important social, health and safety considerations will become more explicit as recommendations are made and different policy options are considered.

Alcohol use and abuse are strongly linked to significant and widespread social, health and safety problems. Ensuring that this public asset is “delivering maximum possible benefits to Ontarians” can only be achieved if it includes a careful examination of related societal costs that fall outside of the beverage alcohol sales “business case”.

We are pleased that “social responsibility” and “public interests” are mentioned several times in the Expert panel’s Terms of Reference and Discussion Paper, but have noted that they are not defined. For example, one of the guiding principles for the Panel is “safeguarding socially responsible consumption, storage, distribution, and sale of beverage alcohol”. The paragraph that covers this in the Discussion Paper contains no reference to alcohol related social problems, but does specifically mention enhanced customer service and economic development – hardly traditional elements of social responsibility.

Direct health problems leading to disease and death, drunk driving and violence are the most obvious examples of the deleterious impacts of alcohol abuse. Beverage alcohol is a product that is heavily regulated for good reasons, but these reasons are not spelled out in the descriptions of this review. While we have every confidence that the Panel will not ignore these considerations, they will assume much greater importance as the government considers the Panel’s recommendations.

Last year, alpha called on the Ontario Government to require that public health impact analysis statements be a component of Cabinet Submissions prepared by any Ministry of Government, similar to the environmental impact statements that are already such an important part of government policymaking. This Resolution is attached for your convenience and careful consideration when you receive the report of the Expert Panel.

Yours truly,

Linda Stewart,
Executive Director

Copy: John Lacey, Chair, Ontario Beverage Alcohol System Review
Dr. Sheela Basrur, Chief Medical Officer of Health
Hon. George Smitherman, Minister of Health and Long-Term Care
Hon. Dalton McGuinty, Premier of Ontario

Encl.

2004 alPHa RESOLUTION NO. A04-9

TITLE: Public Health Impact Statement Requirements

SPONSOR: Board of Directors of the Association of Local Public Health Agencies

WHEREAS the Government of Ontario is responsible under the Constitution Act for legislative matters pertaining to the health of its citizens; and

WHEREAS programs as administered by the Ministry of Health and Long-Term Care have continuously risen to presently account for 45% of the Government of Ontario's entire annual program budget; and

WHEREAS the current Government of Ontario has set a goal of making Ontario's citizens the healthiest in Canada; and

WHEREAS the current Government of Ontario has acknowledged the importance of prevention services (i.e. health protection and promotion, disease prevention and surveillance) and has committed to strengthening the public health system that provides them in order to achieve that goal; and

WHEREAS an effective public health system is essential to preserve and enhance the health status of the population and its individuals, to reduce health disparities and to reduce the costs of curative health services (Naylor, 2003:19); and

WHEREAS a central component of the public health system's approach to prevention is the recognition of the health impacts of a wide range and interaction of social, political, economic, environmental, natural and other factors; and

WHEREAS the above factors may be influenced by or originate from the policies of any Ministry or Agency of the Government of Ontario; and

WHEREAS the Association of Local Public Health Agencies has previously called upon the Government of Ontario to establish province-wide health goals with concomitant requirements and standards for all ministries as per *alPHa Resolution A03-1*;

NOW THEREFORE BE IT RESOLVED that the Government of Ontario immediately require that public health impact analysis statements be a component of Cabinet Submissions prepared by any Ministry of Government.

Action from Conference:

Moved:

A. Hukowich (Haliburton, Kawartha)

Seconded:

I. Parkes (Northwestern)

Carried